

# **EXHIBIT F**

Gail Burns  
Parker, Rogerv. Perdue Foods, LLC

March 26, 2025

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE MIDDLE DISTRICT OF GEORGIA  
3 MACON DIVISION

4 ROGER PARKER,

Case 5:22-cv-00268-TES

5 Plaintiff,

6 v.

7 PERDUE FOODS, LLC,

8 Defendant.  
9

10 REMOTE VIDEOTAPED DEPOSITION OF:

11 GAIL BURNS

12 Being taken pursuant to stipulations herein:

13 Before Regina Holland, CCR

14 March 26, 2025

15 Commencing at 10:04 a.m.  
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1 Q Okay. And at some point in that relationship, did  
2 you and Mr. Parker grow chickens for Perdue?

3 A We did. We started growing chickens for Perdue in  
4 2006.

5 Q Okay. And how did that come about, that you guys  
6 decided to grow chickens for Perdue?

7 A We had previously grown chickens in the  
8 Chattanooga -- out of one of the Chattanooga, Tennessee  
9 integrators from our hometown, where we lived in Lafayette,  
10 Georgia. We grew up there for 16 years. He was, at that  
11 time, a pastor. We moved to Ellenwood, Georgia. He took a  
12 church down there, First Baptist Ellenwood. So we sold our  
13 farm in Lafayette and moved. We had built a house -- a new  
14 house -- sold the farm, built a new house up there, and then  
15 we sold that house and moved to Ellenwood. So then we -- when  
16 he was done at First Baptist, we found the Hillsboro farm in  
17 Hillsboro, Georgia, and we purchased that in 2006.

18 Q Okay.

19 A And Perdue was the only integrator. Basically, we  
20 wanted to go back into the chicken business we had previously  
21 been in.

22 Q And you had mentioned Mr. Parker was a pastor at a  
23 church, and that's why you'd first moved down to that area of  
24 Georgia?

25 A It was. Yes, ma'am.

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1 Q Okay. And do you know when he stopped being a -- a  
2 pastor?

3 A I would just -- it would be a guess. Probably -- I  
4 don't know. 2012, maybe.

5 Q Okay. So was he a pastor at the same time that you  
6 guys would have been raising chickens for Perdue?

7 A He was. He pastored Smithboro Baptist Church. Like  
8 I said, I know that's not a correct date. That's just a  
9 guess.

10 Q And you said he was pastor of Smithboro Baptist  
11 Church?

12 A Yes, ma'am.

13 Q Okay. And then you had mentioned starting  
14 contracting with -- with Perdue in 2006. Was there a reason  
15 that you guys decided to take on chicken farming again?

16 A Our -- at the time, our daughter-in-law was pregnant  
17 with our first grandchild, and we did not want to raise --  
18 they didn't want to raise the baby, nor did we, in Atlanta.  
19 So we started looking for another farm. You know, more of a  
20 rural country setting. And we found that farm and everything  
21 just worked so -- and we had previously grown chickens for 16  
22 years, so, you know, we found that one and liked it. So it  
23 just worked out where we could get that farm.

24 Q And you said you'd previously grown chickens. What  
25 company was that with?

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1           A     ConAgra, out of Chattanooga. We started out with --  
2     I think it was Seaboard Farms, and then, I think, ConAgra  
3     bought them out.

4           Q     Okay. And when you first moved to Georgia, were you  
5     living on a farm, or were you just in a normal house  
6     residence?

7           A     We -- we are from Georgia. We didn't live out of  
8     Georgia. We lived in Lafayette, Georgia, but the company was  
9     out of Chattanooga, Tennessee.

10          Q     Okay. And then at the time you started growing  
11     chickens for Perdue, had you just bought the farm? Or were  
12     you living on a farm at the time that you decided to start --

13          A     We had just --

14          Q     -- growing?

15          A     -- purchased it.

16          Q     And at that time, how many chicken houses did you  
17     have?

18          A     At that time, there was five.

19          Q     Okay. And before we get too much into the chicken  
20     growing, before you had contracted with Perdue, I understand  
21     that Mr. Parker was a pastor and that you guys had previously  
22     raised chickens. Did you have any other jobs or professions  
23     before contracting with Perdue that we haven't talked about?

24          A     I worked for Henry County Water and Sewer.

25          Q     And when would -- what time period would that have

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1 sound, I'm sorry.

2 Q I can hear you just -- just fine.

3 A Okay. Good. I mean, we -- we grew chickens for  
4 many years, so, you know, those agreements were normal. The  
5 company in Chattanooga did them. You know, it was just  
6 something that chicken growers do. You have that poultry  
7 agreement, and you look over it, you sign it.

8 Q And did you -- sorry. Go ahead. I didn't mean to  
9 cut you off.

10 A No. I was finished.

11 Q Did you understand that you guys would be  
12 contractors for Perdue?

13 A Yes.

14 Q And would Perdue provide you with a 1099 each year?

15 A Yes. We got a 1099 every year, just like we did  
16 from the company in Chattanooga.

17 Q And what were you told about, kind of, the equipment  
18 and expenses, if anything, of the -- the operation?

19 A Well, you have to -- you're on different tiers of  
20 pay. And if you want to stay on the top pay, you comply with  
21 all the upgrades, you know, that they call for, and  
22 everything. And that -- that keeps you on the top tier of  
23 pay. So, I mean, they don't make you do them, but if you want  
24 to keep that top tier of pay, you stay in compliance with all  
25 the upgrades and any repairs. And, of course, a lot of it is

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1 due to poultry welfare. Some of the things you have to do to  
2 take proper care of the chickens.

3 Q And did -- do you understand that you guys would own  
4 the, you know, chicken houses, the land, the -- that type of  
5 stuff, at the time?

6 A Yes, ma'am. I mean, that's just the business.

7 Q Basically, Perdue just provides the chickens?

8 A The chickens, and they bring the feed. And then,  
9 you know, there's charges for the feed and different things  
10 like that.

11 Q At any point in the relationship with Perdue, do you  
12 think the relationship changed in any way, or did it stay the  
13 same throughout?

14 A We did have a few bumpy roads. One time there was a  
15 discrepancy on a load of chickens, and they made it right.  
16 They, you know, was able to investigate and see what -- where  
17 it had went wrong. And I believe it was Kathryn and Clay and  
18 Dan came to our house, and they brought a check to compensate  
19 for, you know, what we had been shorted. But we had a good  
20 working relationship with Perdue.

21 Q Did you consider the relationship with Perdue to be  
22 a good opportunity to grow a business?

23 A Absolutely.

24 Q And why do you say that?

25 A Well, it's just -- there's just a lot of things on

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1 11th, of '18.

2 Q Okay. I want to get back -- just getting back to  
3 the -- the relationship with Perdue. At any time did you guys  
4 make upgrades to houses or purchase more houses --

5 A We did.

6 Q -- chicken houses?

7 A We bought the Milledgeville farm. I refer to it as  
8 Milledgeville. It was in Baldwin County. And then the other  
9 farm is in Hillsboro, Georgia, in Jasper County. We --

10 Q Okay.

11 A We purchased the Milledgeville farm in 2009.

12 Q Okay.

13 A At that time, we had caretakers there. We provided  
14 the housing and their utilities, and a vehicle to drive, and  
15 give them a salary every week.

16 Q And the Milledgeville farm was -- did that have,  
17 like, a specific farm name attached --

18 A Hazel -- Hazel Lee.

19 Q And you said you purchased that in 2009?

20 A I believe it was 2009. Yes, ma'am.

21 Q Okay. And you had mentioned caretakers were there.  
22 What did you mean by caretakers?

23 A A couple lived there on the farm for us. We had the  
24 Rotem controllers, which are top notch. The electronics that  
25 go in chicken houses. We could dial into those controllers



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1 from the Hillsborough farm, where we lived at the time, that  
2 we purchased that. And when we purchased that farm, we did  
3 have to do a lot. I think it was about \$180,000 worth of  
4 upgrades that -- they did not have the cool cells on them, the  
5 upgraded cool cells. We had to do all that. Put some new  
6 fans in, heaters, things like that.

7 Q What -- what was the name of the couple you said  
8 that lived on the farm?

9 A Brian and Sarah Bachelor lived there first, and then  
10 the second couple was David and Michelle, I think. I don't  
11 recall their last name. He probably has the paperwork on  
12 them. I don't have any -- any papers from --

13 Q And would these -- the -- the caretakers that you  
14 just named and referred to, would they help with the chicken  
15 houses and the chicken farming?

16 A They did. They -- they took care of the daily  
17 needs.

18 Q Do you know if that was a full-time occupation for  
19 these individuals or --

20 A It was. It was full-time.

21 Q And when you say full-time for them, are you  
22 referring to, you know, they probably work 40 hours a week  
23 keeping up the Milledgeville farm?

24 A Yeah. Some -- I mean, farming is -- sometimes you  
25 put in more hours, sometimes less. Everything's running good,

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1 you know, it's -- it's not bad at all.

2 Q And what time period, if you recall, would these  
3 caretakers have been helping out with the Milledgeville farm?

4 A It -- we put caretakers there when we -- when we  
5 purchased it in 2009. And I think Brian and Sarah stayed  
6 there maybe three years.

7 Q Okay.

8 A And then Mr. David, they -- they may not have made  
9 it quite a year, and we had to move there.

10 Q And would you guys pay these caretakers?

11 A Yes. They got 400 a week, plus all their utilities,  
12 their housing, phone, you know, cable TV. Whatever they --  
13 whatever they needed, that's what they got. Sorry. I'm at --  
14 I'm at work in a back office here.

15 Q That's okay. I was just making sure you're --  
16 you're back by yourself again.

17 A Yes, ma'am.

18 Q And would you -- do you recall if you paid them a  
19 W-2 or if you paid them a 1099?

20 A 1099.

21 Q And did you -- do you know if you ever offered them  
22 any kind of, you know, insurance or benefits, or anything like  
23 that, to -- to be --

24 A We did not.

25 Q -- caretakers?

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1 A It's just merely contract labor.

2 Q Okay. And then, other than Brian and -- and Sarah  
3 and David and Michelle, were there any other helpers or  
4 caretakers at the Milledgeville farm that you recall?

5 A No. Just, I mean, you hire somebody here and there  
6 to help you unload chickens, or, you know, if you can get a  
7 helper to help you pick up the dead ones every day. You may  
8 have this one or that one in and out, but I wouldn't remember  
9 all the names, you know, the different helpers I may have had  
10 along the lines.

11 Q Okay. So for the -- the Milledgeville farm, there  
12 would have been caretakers there from about 2009 to 2013?

13 A Probably around -- yeah. That sounds fairly  
14 accurate, I believe. Like I said, he probably has paperwork  
15 and canceled checks and stuff on that, that I don't have  
16 access to.

17 Q And then the -- the other farm, the Hillsboro farm,  
18 when -- when did you purchase that again?

19 A We purchased it in 2006.

20 Q Okay. And did you have any helpers or caretakers on  
21 the Hillsboro farm?

22 A He started out operating the Hillsboro farm while I  
23 still worked at Henry County. And I would get up at -- like,  
24 at 4:00 and go to the convenience store and do breakfast. And  
25 then I would leave, and my daughter-in-law and our oldest son

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1 A 2009 on Milledgeville.

2 Q 2009?

3 A Yes, ma'am.

4 Q Okay. Were there any other times where you  
5 bought -- that we haven't already talked about where you  
6 bought additional chicken houses or upgraded chicken houses?

7 A No. Those two farms was -- well, other times would  
8 have been way back in the past, when we bought his parents'  
9 farm. That would have been in -- I don't know -- late '90s  
10 early 2000s.

11 Q And that was before contracting --

12 A That was --

13 Q -- with Perdue?

14 A Yes. Correct. But it was contract labor as well.  
15 I mean, it's not like you don't know what you're getting into,  
16 especially when you've done it previously and for 16 years.  
17 You know the business, and you know what it is, and you know  
18 what you're getting into.

19 Q And as far as the chicken farming business, do you  
20 know if that was set up in a corporate entity, or an LLC, or  
21 something along those lines?

22 A It was not. Not that I'm aware of.

23 Q Okay. Were there names for the different chicken  
24 farms? I believe you had referenced Hazel Lee was one.

25 A Hazel Lee. We did -- I forgot. We did lease the

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1 farm at Juliette, Georgia one time. It was Roosevelt Farm. I  
2 had forgotten about that. But we just leased it, and it was  
3 only, like, maybe two years.

4 Q What time period would that have been?

5 A I'm thinking maybe 2007, maybe 2008. We didn't --  
6 we didn't lease it very long. The farm was in terrible shape,  
7 and it was just too much.

8 Q And just getting back to the -- the names of the  
9 farms. I know you'd referenced Hazel Lee was the name of one  
10 of the chicken farms. Was there another farm name?

11 A Parker's Poultry. That's the Hillsboro farm.

12 Q Okay. And you had mentioned Mr. Parker --  
13 Mr. Parker had a poultry equipment type business. Do you  
14 know --

15 A He did.

16 Q Do you know if that was set up through a  
17 corporation, or an LLC, or anything like that?

18 A No, it wasn't.

19 Q Okay. Do you know what the name of his equipment  
20 business was?

21 A Parker's Poultry Equipment.

22 Q And switching back. I know we had talked about,  
23 kind of, your -- what you did on the -- the chicken farm on  
24 the -- the day-to-day. Did you -- were you able to set your  
25 own schedule as to, you know, what you wanted to -- to do each

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1 day?

2 A You can.

3 Q All right. Were you able to take breaks during the  
4 day, if you needed to take a break at any time?

5 A Oh, yeah. I mean, if you -- even if you had a major  
6 breakdown, I mean, everybody's going to get tired and you got  
7 to take a break. But --

8 Q Did anyone -- sorry. Go ahead.

9 A That's just -- you know, that's just the nature of  
10 it. Farming's a little bit different life. But, yeah. You  
11 can make -- as long as those chickens are -- the welfare of  
12 them is taken care of, you make sure they're okay in the  
13 mornings, and you get those dead ones out of there. And, you  
14 know, they got feed. They got water. They got air. I mean,  
15 and -- and if everything's running good, I mean, you -- there  
16 was a lake there at Lake Sinclair. We could go over to the  
17 lake. You know, it's a good life.

18 Q Did anyone at Perdue ever tell you, you had to  
19 start, you know, your day at a certain time, or anything --

20 A No.

21 Q -- like that?

22 A No.

23 Q And I know we had talked about several helpers. The  
24 caretakers at -- at Milledgeville, and then you mentioned  
25 maybe a Mr. Robert Taylor had -- had helped out at some point

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1 after he had left the farm. Were there other helpers that  
2 assisted with the chicken farming during that, you know, 2006  
3 to present time period?

4 A Well, when we did the upgrades, you know, some guys  
5 from church, just this one and that one, we hired to come and  
6 give us a hand. You know, as far as cleaning -- cleanup or  
7 ripping old equipment out or -- you know, things like that.  
8 That would have just --

9 Q Sorry. Go ahead.

10 A That would have just been random people.

11 Q Do you recall any -- any of those individuals?

12 A There was a guy named Big Mike that helped us some.  
13 He actually lived at the Juliette farm for a little while, but  
14 he didn't do very good, so we couldn't keep him.

15 Q What time period would Big Mike have helped out?

16 A That would have been during Juliette. That would  
17 have been 2007 or '08. And then he did work some after we  
18 bought Milledgeville. He worked helping us. There was a lot  
19 of lumber to be tore off the front of the houses. So it's not  
20 something that one or two people -- yeah. I mean, you could  
21 do it, but it's much, much faster and more effective to get  
22 a -- you know, several hands in there to get that thing tore  
23 off and start going back with equipment. Our son, Simon,  
24 he -- he helped a lot with those upgrades.

25 Q And did you pay Big Mike? And did -- would you pay

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1 Simon as well?

2 A Yes.

3 Q And how were they paid?

4 A Check.

5 Q Were they given just a -- a flat rate, or were they  
6 paid hourly?

7 A Sometimes both. Sometimes it was by the job kind of  
8 thing, depending on what there was to do. But, you know, most  
9 of the time it was hourly, but I wouldn't remember how much  
10 hourly it would have been.

11 Q And you mentioned your son, Simon, helping out on  
12 the farm. When -- or what time period was he helping out?

13 A He helped with the -- the upgrades when we first  
14 bought Milledgeville, and then he helped with upgrades on the  
15 Hillsboro farm. He actually went to work with -- for us at  
16 one point, with the equipment company. And then later on, he  
17 and his wife leased the Hillsboro farm from us.

18 Q Okay. And when did they lease the Hillsboro farm?

19 A If I remember correctly, it was 2015.

20 Q Okay. Is that still currently going on, or did that  
21 stop at some point?

22 A No. It's still currently going. It's producing and  
23 doing well.

24 Q And would Simon help out with other parts of the  
25 chicken farming operation from time to time?



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1           A     He did.  If -- you know, if I had -- if I had motors  
2     or something -- the big motors or something that was out and  
3     Dale was sick and he couldn't go down there, he will come and  
4     change them for me.

5           Q     How often was Simon helping out with the chicken  
6     farming operations for you guys?

7           A     Well, after he started working for us, I mean, it  
8     was -- you know, he was full-time.  If something needed doing  
9     at the Hillsboro farm, he went -- you know, he did it there.  
10    If something needed doing at the Milledgeville farm, he came  
11    there.

12          Q     Okay.  And were you guys paying Simon at that time?

13          A     Yes.  He made \$500 a week.

14          Q     And at the time you left, were you still paying  
15    Simon that \$500 a week?

16          A     No.  He had already leased the Hillsboro farm.  And  
17    so, they were -- you know, they did all the -- the bills, the  
18    income.  Everything went over to them at that time.

19          Q     Okay.  And after Simon started leasing, did he ever  
20    come back over to help you with -- with your chicken farms?

21          A     Oh, yeah.  He had to come and help me a lot.

22          Q     And how often was he helping with -- with your  
23    chicken farming operations, after the --

24          A     He -- he was over there two or three times a week,  
25    probably.

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1 Q How many hours do you -- would you estimate if he  
2 was over there two or three times a week helping you?

3 A Sometimes he was over there probably 40 hours.

4 Q Would this have been at Hazel Lee? Or which farm  
5 would this have been at?

6 A Hazel Lee. Mm-hmm. And his wife, she's the main  
7 caretaker of that farm over there, like I did. I've trained  
8 her to raise chickens, so she's the main caretaker there. So  
9 that's how he was able to go back and forth.

10 Q And I believe you had mentioned that there may have  
11 been some people that would come and help out with chicken  
12 catching or other stuff that happened from time to time. Can  
13 you just tell me a little bit about how many people would help  
14 with that, and how often that was?

15 A Well, that was -- Perdue sent the catch crew in.  
16 That was Perdue's thing. I just got the houses ready for  
17 catch.

18 Q And was there -- let me ask this probably in a  
19 different way. Was there anybody you guys hired to help at  
20 other times during the chicken farming operations that we  
21 haven't already talked about?

22 A Yes. Yes. At different times, I would hire  
23 somebody, as I could find somebody. It's not a very desirable  
24 job that people want to do, because it's nasty. But when I  
25 could find help about picking the dead ones up, then, you

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1 know, I would hire somebody to go in and pick the dead ones  
2 up. And, of course, I go behind them to check to make sure  
3 everything was okay.

4 Q And how often were you hiring these individuals?

5 A In the summertime, I tried to keep a helper, but,  
6 you know, it was tough with the nature of the business.  
7 But -- and -- and there toward the end after Dale got -- after  
8 he went and had the heart failure -- because he was sick, I  
9 had his mother. We kept his mother since 2001 when his father  
10 passed away. We'd had her. And then our son that passed  
11 away, I had his children a good portion of the time. So I was  
12 pretty pulled between the chicken houses, the grandkids, and  
13 him being sick. And, you know, there should be ample  
14 documentation as far as his sickness, with his heart failure,  
15 to show, you know, that he physically was not able.

16 Q And just going back. So every summer, would you  
17 have, kind of, a -- a helper that would come and help with the  
18 chicken farming?

19 A Yes, ma'am.

20 Q Do you recall the names of any of those individuals  
21 that helped during the summer?

22 A One that I had was Mike James.

23 Q And what time period would he have been helping, if  
24 you recall?

25 A I don't know.

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1 Q Okay.

2 A Big Mike helped me before. There was another kid  
3 out of Monticello. Ricky Mullins, he helped me before.

4 Q And let me ask it this way. Was -- was there  
5 somebody there every summer up until the time you left the  
6 farm that was helping with chicken farming?

7 A Pretty much. With so much going on with him being  
8 sick and his mother being sick and having the grandkids, you  
9 know, I had to try to keep a helper. Roy. A gentleman named  
10 Roy, he helped me for quite some time. And Adrian Cabrera, he  
11 was the best helper I had. Adrian helped for -- Adrian helped  
12 me over a year, because we had a fifth wheel camper that he  
13 lived in. And he was a very hard worker. He helped me a lot,  
14 and that was a big help with having those three grandchildren  
15 there at that time.

16 Q And what kind of tasks were they performing on the  
17 farm for you at that time?

18 A Adrian did it -- he could do it all. He'd go in,  
19 check them, pick the dead ones up. He'd come and let me know  
20 if -- if something was wrong that I needed to go take a look  
21 at, or if I needed to get somebody to come help repair. And  
22 there was some -- Jess Chambers. He's another chicken farmer  
23 for Perdue. He'd come, and he's done some tractor repairs for  
24 me. Some flat tires, and things like that, that I've had on  
25 the tractor before. And José Perez, he was another grower for

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1 Perdue. He's come out and helped me change motors before, the  
2 220 motors that I wasn't able to change and Simon couldn't get  
3 over there. So José, he's come and changed motors for me  
4 before.

5 Q Okay. And did you guys pay all these guys via, you  
6 know, 1099 or a W-2, or how were they paid?

7 A Well, Jess and José, they didn't charge anything,  
8 because it was like doing a farmer a favor. You know, doing a  
9 friend a favor. Because then if they needed help or  
10 something, we go help them out.

11 Q Okay.

12 A So that was no money involved there. But the rest  
13 of them, I did 1099.

14 Q Okay.

15 A Ricky and Roy and Adrian. Once there was David  
16 Bachelor. I'm just remembering people along the line, because  
17 there was several along -- you go through a lot of help like  
18 that -- with something like that. Because, like I said, it's  
19 not a clean job and it's not desirable, so it's hard to keep  
20 them.

21 Q Okay. And I know you had mentioned, you know,  
22 there's a lot of different work on the farm. You know,  
23 besides that -- the actual, you know, going in to check on the  
24 chickens, what else is involved in -- in raising chickens? I  
25 believe you'd mentioned mowing was one thing that had to be

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1 flocks. Now, had they not done that for us, I mean, we  
2 couldn't have got chickens. It was cold. And, you know, they  
3 were as helpful as they could be. This lawsuit blows my mind.  
4 I don't get it. I just don't get it.

5 Q And, Ms. Burns, you mentioned issue with a water  
6 line. What -- why are water lines important in a chicken  
7 house?

8 A Well, they're not going to get water if that line is  
9 down. I mean, they can get it from some of the other lines.  
10 But those chickens that are over there on that side where that  
11 line is down at, they're not going to get. There's no water  
12 there for them to get.

13 Q Ms. Burns, I want to switch back a little bit. I  
14 know we had -- we had talked about it, was Mr. Parker's  
15 poultry equipment business.

16 A Mm-hmm.

17 Q And I think you had described it as he was basically  
18 fixing, maybe, poultry equipment and houses for other growers;  
19 is that accurate?

20 A That's correct.

21 Q Okay.

22 A Until it got to where he was unable to do it.

23 Q Okay. And what time period was he actively  
24 operating that business?

25 A Probably -- probably around 2007, he started that.

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1 Maybe, '08.

2 Q And was that -- how -- how long was that active?

3 A It was -- I think he still does a little bit of  
4 stuff off and on. I'm not sure.

5 Q Okay.

6 A From just hearing Simon say he went to one of the  
7 growers down in Macon and -- and did some work. But -- so I  
8 don't -- I don't really know if he still does that --

9 Q And while --

10 A -- or not.

11 Q -- you're -- sorry. Go ahead.

12 A While we were together, he didn't do very much the  
13 last -- probably 2016 was -- it, kind of, started to fizzle  
14 out.

15 Q So up until 2016 -- I think you said 20 -- 2006 was  
16 when you originally bought the farm, right?

17 A Right.

18 Q From 2006 to 2016, you know, how much was he working  
19 on the poultry equipment business on average every week?

20 A Yeah. He did -- he -- that was his thing. He did  
21 the equipment. He would get -- he would get the jobs, order  
22 the equipment, get a crew together and go, you know, oversee  
23 them getting the job done.

24 Q Was he doing that full-time every week during that  
25 time period of 2006 to 2016?

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1 A A lot -- a lot of it was full-time for him.

2 Q And when I say, full-time, I'm, you know, talking  
3 about, you know --

4 A Yeah. He's out of the house and -- he's out of the  
5 house and gone to it every day. That's what I consider  
6 full-time. You know, he's -- he's in his truck, and he's  
7 going to make sure the crew is going, make sure the equipment  
8 come in on the job, and different things like that.

9 Q And -- and after 2016 was he still doing the  
10 equipment business, just at a lesser rate?

11 A He -- yeah. He would do, like, ordering stuff.  
12 But, you know, his health had, kind of, started going down,  
13 and he didn't do as much. But he would still order and get  
14 things for different farmers. He just didn't do quite as many  
15 installs after that.

16 Q Do you know how much -- you know, just a average  
17 of -- after 2016, you know, average in a week, how much he was  
18 working on the poultry equipment business?

19 A I don't know. I just have to put some thought to  
20 that. It'd just be a -- a guess.

21 Q Was he still working that business on a weekly  
22 basis?

23 A Some, he was. Because he bought some used equipment  
24 out of North Georgia, and he was hauling that in, and  
25 different things like that.



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1 Q And how did he get business for that poultry  
2 equipment business?

3 A Through --

4 MR. KLORFEIN: Objection.

5 BY MS. WOOTEN:

6 Q Go ahead.

7 A Through Perdue. We did -- he did upgrades on the  
8 first farm we bought, put some cool cells on it. And they  
9 come out and looked, and they liked it. And they said, you  
10 know, If you want to do some more upgrades for other people,  
11 we can put your name out there. So he started, you know,  
12 doing work for other farmers then.

13 Q Do you know if he did any advertising for that  
14 business?

15 A I don't recall. I don't recall. Think it was more  
16 word of mouth, and through Perdue spreading the word for him.

17 Q And I know we talked about, you know, obviously the  
18 chicken farming business, some other jobs that you had during  
19 that time period, and Mr. Parker's poultry equipment business.  
20 Was there any other businesses that you guys had, or jobs that  
21 you had during that time period that we haven't talked about?

22 A Not that I recall.

23 Q Did you guys do any other type of agriculture or  
24 farming other than chicken farming?

25 A No. Well, we had some cows there on the farm, but

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1 out for so many flocks. That way, you know, you're not having  
2 to get a loan.

3 Q Okay. Did -- in working with Perdue as a  
4 contractor, did they ever require you to wear a uniform, like  
5 a specific t-shirt or anything?

6 A No.

7 Q Okay. Also, I know we had talked about that there  
8 were certain expenses in chicken farming that you would pay.  
9 I believe, you know, the buildings and houses being one. Were  
10 there other things that you would pay for --

11 A Electricity, fuel. Perdue does have a fuel  
12 allowance. They did then. I don't know what their practices  
13 are now. But they had a fuel allowance that you got to help  
14 you cover the propane cost. You know, the cost of -- the cold  
15 weather would use so much gas, they helped you with it.

16 Q And all of those expenses that, you know, you guys  
17 had to pay for, you know, the chicken farming, were you -- do  
18 you know if you're able to write those off as business  
19 deductions on your taxes each year?

20 A You can. Yes, ma'am. You can.

21 Q Do you recall whether you guys did so?

22 A We did.

23 Q Okay. And then going back to about the time -- I  
24 think this was probably around the time that you had -- had  
25 left the farm. Do you recall if you received a letter from

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1 Perdue regarding some repairs that needed to be made on the  
2 farm?

3 A I do. I did receive that.

4 Q Okay. Can you tell me a little bit about the -- the  
5 situation that was going on with that?

6 A The farm needed -- there was -- it needed motors;  
7 fan motors, some feed line motors. I don't recall all of the  
8 things that it needed, but basically they weren't going to  
9 bring birds back until we did those things. So -- but it was  
10 stated in there, you know, when these repairs are made, and it  
11 was due to the welfare of the birds. They wouldn't have been  
12 able to get the air that they need, the food they need. You  
13 know, things like that, that they have to have. So they said,  
14 When these are done, we will place chickens back.

15 Q And do you recall if -- were these -- were there  
16 issues -- when you left the farm, I think, in late 2018, do  
17 you recall if these issues were going on then? Or if they  
18 occurred after you had left the farm?

19 A They were going on them.

20 Q Okay. And to your knowledge, you know, what  
21 happened after you left the farm as far as the condition of  
22 the farm?

23 A To my knowledge, it just -- it was shut down.

24 Q Do you know --

25 A I think he did --

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1 Q Go ahead.

2 A I'm sorry. I think he did two flocks. He finished  
3 the flock up that I had started, and I think he did one more  
4 flock.

5 Q Okay. And then do you know why there was only two  
6 flocks done after you left?

7 A I don't.

8 Q Okay.

9 A I have -- it will just be speculation.

10 Q Do you know if the repairs that were discussed were  
11 ever completed on the farm?

12 A They were not.

13 Q Do you have any knowledge of the -- the work that  
14 Mr. Parker was doing on the farm after you left?

15 A I don't. I'm assuming there was none, or they would  
16 have continued growing.

17 Q Ms. Burns, did Mr. Parker ever file for bankruptcy  
18 while you were with him?

19 A No. He did after -- I think, after our divorce.

20 Q Do you know if he ever contemplated filing for  
21 bankruptcy prior to your divorce?

22 A I don't know. Maybe during, you know, a heated  
23 discussion or something of finances getting tight, hard, he --  
24 you know, he may have said, but, no, I don't -- I don't know.

25 Q Okay. Just give me just a -- just a moment.

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1 Q Okay. And I apologize if I am jumping around a  
2 little bit. The reason why I'm doing so is to avoid reasking  
3 questions that you've already covered. So apologies if I take  
4 a little moment to -- to just reorient myself. It's only to  
5 try to be a little bit more efficient and get you out of here  
6 sooner rather than later.

7 A That's fine.

8 Q Now, we've referenced Hazel Lee and the other farms,  
9 but I wanted to try to make sure that we're on the same page  
10 when I talk about them. Did you and Mr. Parker previously own  
11 a farm located at 897 East 24 Highway in Baldwin County?

12 A We did.

13 Q Can I refer to that as the Milledgeville farm?

14 A Yes. That's fine.

15 Q Okay. And you also had a -- a farm in Hillsboro,  
16 Georgia, right?

17 A Correct.

18 Q I'll refer to that as the Hillsboro farm, fair?

19 A That's fair.

20 Q Okay. Now, during the divorce proceedings that you  
21 had with Mr. Parker, you ended up listing the Milledgeville  
22 farm for \$1.195 million. Do you remember that?

23 A We attempted to list it.

24 Q Did -- you did in fact list it for that amount?

25 A They didn't do the --

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1 MS. WOOTEN: Object to form.

2 BY THE WITNESS:

3 A -- listing, because it needed repairs.

4 Q Got it. Did you come up with the \$1.9 -- 195  
5 million amount?

6 A No. That would have been through the real estate  
7 and --

8 Q Do --

9 A -- just property values and comps, and different  
10 things like that at the time.

11 Q Understood. Were you a -- a licensed real estate  
12 agent at the time?

13 A No.

14 Q Have you ever been a licensed real estate agent?

15 A I have been.

16 Q When were you a licensed real estate agent?

17 A 2000.

18 Q How long were you licensed as a real estate agent?

19 A Maybe two years.

20 Q And -- and based on your experience working with --  
21 did you have a real estate broker at the time that you wanted  
22 to list at 1.195?

23 A Yeah. We talked to a -- I think, Dale actually met  
24 with him, because I wasn't at the farm. I think he came out  
25 there after I'd left. He was out of Blue Ridge. I don't know

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1 his name.

2 Q Got it. And did -- did you interact with him in any  
3 way?

4 A Just over the phone. But basically it was Dale's  
5 responsibility to get the sale of that going, and he never  
6 did.

7 Q Gotcha. But at some point that -- that  
8 responsibility shifted to you, correct?

9 A It did. I had to take him back to court. When I --  
10 when I found out he had not put chickens back in the houses, I  
11 had to take him back to court to get the judge to flip the  
12 farm back to me so I could clean it up to try to get it to  
13 sell, but it was too far gone. The payments were too far  
14 behind by then, because he had not been proactive on getting  
15 it sold or keeping chickens in it to make those payments  
16 before it went into bankruptcy. Into -- into foreclosure, I  
17 mean.

18 Q And just so I understand. At the end of 2019, you  
19 are the one who was then empowered to list the -- the  
20 property?

21 A Yes. But the bank would not work with me, because  
22 the payments were so far behind. So it went into foreclosure.

23 Q Understood. But before it went into foreclosure,  
24 did you then begin working with that same broker?

25 A No. I didn't have an agreement with him. I was

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1 trying to get the place cleaned up. It was a total, absolute  
2 disaster.

3 Q Gotcha. But do you have any basis to dispute the  
4 1.195 million as the -- what the broker believed that it might  
5 be able to be --

6 A No. I --

7 Q -- sold for?

8 A I --

9 MS. WOOTEN: Object to form.

10 BY THE WITNESS:

11 A I have no -- no dispute on that. I think we paid  
12 984, and it should have been well worth that, you know, with  
13 things we had done.

14 Q Okay. I want to ask you about some specific  
15 questions then, that Ms. Wooten had asked you previously. You  
16 mentioned that Perdue was the only integrator in the area when  
17 you-all decided to buy, I think, your first farm with -- that  
18 you were working with Perdue. Was that accurate?

19 A Yes. That's correct.

20 Q Did that remain true from when you first began  
21 working Perdue -- with Perdue through, I guess, the end of  
22 2018 when you left the farm?

23 A Yes.

24 Q There weren't other integrators that worked in the  
25 area?



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1 A No. They were --

2 Q So --

3 A -- the only ones.

4 Q And I apologize for interrupting you. Sometimes  
5 with Zoom -- I -- I mean no disrespect by that.

6 A That's okay.

7 Q So from -- for that entire period of time, if you  
8 wanted to go with an integrator, Perdue was the only option?

9 A Correct. And we knew that when we purchased.

10 Q You mentioned that you had started in -- in another  
11 farm working with ConAgra. Remember that testimony?

12 A Yes.

13 Q Did you ever compare the -- the specific terms  
14 between the ConAgra agreement and the Perdue agreement?

15 A Not the terms. I found some old pay stubs. Just  
16 from memory. I mean, I didn't have anything in writing from  
17 ConAgra, but just from memory, it's -- I mean, it's all about  
18 the same.

19 Q Got it. You -- you mentioned an issue where there  
20 was a discrepancy on a load of chickens, and then Kathryn,  
21 Clay, and Dan came into your home to -- to address it. Do you  
22 remember that testimony?

23 A I do.

24 Q When -- when did that occur?

25 A Gosh, I don't know the -- it was probably -- I don't

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1 know -- between '16 and '18, I guess. I don't know.

2 Q And I don't want you to speculate. Just if you  
3 remember, that's fine. If not --

4 A Yeah. I don't remember.

5 Q Do -- do you recall what happened in that situation,  
6 why they had to come -- come into your home and address the  
7 issue? What the issue was?

8 A There was a discrepancy in the truck tickets.  
9 They -- when they carry loads of chickens out, they leave a  
10 ticket in the mailbox. And there was a discrepancy, so we had  
11 discovered -- we felt like we were missing a load of chickens.  
12 And so, then they investigated and come to the fact that they  
13 felt like there was a discrepancy as well, and they needed to  
14 make it right, so they did. They brought a check out to pay  
15 the difference.

16 Q Who discovered this discrepancy?

17 A I don't know.

18 Q May have been Dale? You don't know?

19 A It could have been -- it probably was him.

20 Q It probably was Dale?

21 A It probably was.

22 Q And what -- and may I ask, what makes you say that  
23 it was probably Dale that -- that discovered that discrepancy?

24 A Because I had got the tickets and brought them to  
25 the house and put them on the table. And he -- he probably

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1 was the one that went through him.

2 Q He would, as a matter of course, go through the --  
3 the tickets?

4 A Not -- not all the time, but sometimes he did.

5 Q And then, did you raise the issue with Perdue, or  
6 did Dale?

7 A He did.

8 Q So he was the point of contact to Perdue on those  
9 issues?

10 A Yes.

11 Q So he regularly talked with the Perdue folks?

12 MS. WOOTEN: Object to form.

13 BY THE WITNESS:

14 A Yeah, he did. I'd say, yes.

15 Q And after he raised this with Perdue, do you recall  
16 what happened next?

17 A I know he called -- is it Stockyards and Packers?  
18 Some organization. He called them on them, but I felt like  
19 that was done without giving them a chance to rectify or see,  
20 you know, if they felt like a mistake had been made. But --  
21 and then, you know, he talked back and forth with Clay  
22 Copeland.

23 Q So do you disagree with his decision to reach out to  
24 a -- a third party about this issue -- issue?

25 A I think they should have been given a little more

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1 ample time to -- to do what they needed to do.

2 Q Did Kathryn, Clay, or Dan apologize for this issue?

3 A I don't remember.

4 Q Did you ever have any additional issues where there  
5 was a discrepancy that you had to identify for Perdue?

6 A There would be feed discrepancy sometimes, or maybe  
7 the truck drivers spill feed on the ground. And, you know,  
8 they'll give you credit for it, because you check your feed  
9 tickets and stuff after the trucks come in and out. But  
10 nothing major. No. There was no major issues.

11 Q And I'm sorry. Can you explain to me what a feed  
12 discrepancy would be?

13 A Maybe a truck driver said he dropped 28,000 pounds.  
14 But in fact, he didn't drop but 20,000 pounds. Or he  
15 dropped -- he didn't have the boom over the feed bin, and he  
16 dropped 2 or 3,000 pounds on the ground, so therefore you  
17 can't use it. It's contaminated. And, you know, just issues  
18 like that. But those are just not major things.

19 Q Well, for issues like that, would that still be on  
20 the grower to identify the problem for Perdue?

21 A Well, yes. But it's not for Perdue. It's for your  
22 only interest.

23 Q Fair. I -- I guess I -- my -- my point is that  
24 to -- to spot the problem, to spot the discrepancy, that's on  
25 the grower?

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1 A Yeah.

2 Q Did you -- you mentioned earlier when counsel for  
3 Perdue was asking you questions about interacting with other  
4 Perdue growers, did -- did you ever hear of them having issues  
5 with discrepancies?

6 A No. We didn't get into conversations like that.

7 Q You didn't go into detail, but they might have?

8 A I don't know if they did. No.

9 MS. WOOTEN: Object to form.

10 BY THE WITNESS:

11 A I don't know.

12 Q Now, you mentioned earlier in your examination that  
13 sometimes alarms would go off, and you'd have to go out and  
14 address an issue with the chickens or some type of alert that  
15 had -- had rung out; is that right?

16 A That's correct.

17 Q So you were on call all night, depending on whether  
18 or not those alarms went off?

19 A You're on call 24/7, whether you're out at a  
20 restaurant or whatever. I mean, that's --

21 Q If -- if you're out at -- I'm sorry. Continue. I  
22 didn't mean to kick off.

23 A Go ahead.

24 Q So -- so even if you're not physically on the -- the  
25 farm at all times, you might need to come back to the farm if

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1 at 0 interest.

2 Q And I think you referenced the 1099s and those types  
3 of forms. Were you the -- the person primarily responsible  
4 for handling the taxes?

5 A Dale's social was on it, but I handled getting  
6 everything ready for the tax lady. And, yeah. I did all the  
7 prep work.

8 Q You had referenced growing for ConAgra prior to  
9 Perdue. Did you develop a lot of experience growing during  
10 that time?

11 A I did.

12 Q And let's talk about the two different farms  
13 separately, because it's my understanding that those were two  
14 different time periods; is that accurate?

15 A It is.

16 Q Hillsboro farm, you started first, and then  
17 Milledgeville was later?

18 A Correct.

19 Q Okay. What were your responsibilities on the  
20 Hillsboro farm?

21 A Picking up dead chickens, mowing weedeating, making  
22 sure the control rooms are clean, keeping the rat bait boxes  
23 full. Making sure the chickens have feed and water. You  
24 know, if a repair had to be made, either do it or get somebody  
25 to do it. Make sure they have ample air.